

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, §

ex rel. ALEX DOE, Relator, §

THE STATE OF TEXAS, §

ex rel. ALEX DOE, Relator, §

THE STATE OF LOUISIANA, §

ex rel. ALEX DOE, Relator, §

Plaintiffs, §

V. §

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD §

FEDERATION OF AMERICA, INC., §

PLANNED PARENTHOOD GULF §

COAST, INC., PLANNED §

PARENTHOOD OF GREATER

TEXAS, INC., PLANNED §

PARENTHOOD SOUTH §

TEXAS, INC., PLANNED §

PARENTHOOD CAMERON §

COUNTY, INC., PLANNED §

PARENTHOOD SAN ANTONIO, §

INC., §

Defendants. §

**DECLARATION OF HEATHER HACKER IN SUPPORT OF
RELATOR’S OPPOSITION TO THE PPFA AFFILIATES’ MOTION
FOR PROTECTIVE ORDER**

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury as follows:

1. I am over the age of eighteen and am competent to make this declaration.

2. Using the e-discovery platform Relativity, I retrieved the numbers of documents in each of the PPFA Affiliates' productions as well as the numbers of documents designated Attorney Eyes Only and Confidential. That data is reflected in the chart attached to this declaration as Exhibit 1.

3. The PPFA Affiliates have de-designated or re-designated some documents since they were originally produced. To the best of my knowledge, these numbers reflect the *current* designations of the produced documents. Thus, when originally produced, there were even more documents designated as AEO/Confidential.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on November 25, 2022.

/s/ Heather Hacker
Heather Hacker

Exhibit 1

PP Affiliate Production	Date	Total Docs	AEO	Confidential	% AEO/ Confidential	% AEO
PPGC012	10/24/22	11,726	7,639	1,168	75%	65%
PPGT010	10/24/22	25,479	13,972	4,727	73%	55%
PPST009	10/26/22	2,461	1,491	266	71%	61%
PPGC013	11/8/22	17,822	9,028	3,533	70%	51%
PPGT011	11/8/22	42,173	17,459	10,038	65%	41%
PPST010	11/8/22	14,508	7,091	2,538	66%	49%
PPGC014	11/16/22	72,551	23,722	7,733	43%	33%
PPGT012	11/16/22	52,624	11,074	9,052	39%	21%
PPST011	11/16/22	47,520	10,794	4,233	32%	23%
PPGC015*	11/22/22					
PPGT013*	11/22/22					
PPST012*	11/22/22					
All Pre-Objection Productions	Before 10/19/22	34,261	8,226	10,040	53%	24%
All Available Post-Objection Productions	10/19/22-11/21/22	286,864	102,270	43,288	51%	37%
TOTAL:		321,125	110,496	53,328	51%	34%

* Plaintiffs have not been able to access these productions yet so these numbers are not yet available.